

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROBERT SCHMIDT, RUSSELL ADAMS, and
JASON TAYLOR, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

Civil Action No. 2:18-cv-08528-CCC-JBC

JAGUAR LAND ROVER
NORTH AMERICA, LLC,

Defendant.

**NOTICE OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE THAT on March 9, 2022, at 10:00 a.m. or as soon thereafter as counsel may be heard, Plaintiffs Robert Schmidt, Jason Taylor, and Russell Adams (collectively, the “Plaintiffs” or “Named Plaintiffs” or “Class Representatives”) will move before the Honorable Claire C. Cecchi, U.S.D.J., of the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- 1) granting final approval of the proposed class action Settlement;
- 2) Certifying, for settlement purposes only, and pursuant to the terms of the Settlement Agreement, the proposed Class;
- 3) appointing Kantrowitz, Goldhamer & Graifman, P.C. and Thomas P. Sobran, P.C., as class counsel; and,

4) Approving the previously filed motion (at ECF Dkt No. 72 through 72-4) for an award of attorneys' fees, reimbursement of expenses and granting of a service award to the class representatives.

In support thereof, Plaintiffs have contemporaneously filed a supporting memorandum and the Joint Declaration of Gary S. Graifman and Thomas P. Sobran with accompanying exhibits. Defendant Jaguar Land Rover North America, LLC, does not oppose Plaintiffs' requested relief set out in the memorandum and the accompanying [Proposed] Order.

For the reasons set forth in the supporting memorandum, Plaintiffs respectfully request that the Court grant the motion and enter the accompanying [Proposed] Order.

Dated: February 14, 2022

Respectfully submitted,

KANTROWITZ, GOLDHAMER & GRAIFMAN, P.C.

/s/ Gary S. Graifman

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the __ day of February, 2022, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ Gary S. Graifman
Gary S. Graifman, Esq.